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October 5, 2021

Via ECF

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Shaw-Nae Dixon, et al. v. Bill DeBlasio, et al.
Civil Action No. 1:21-cv-05090-MKB-LB
Our File No. 24103**

Dear Judge Cogan:

As Your Honor is aware, this firm represents the plaintiffs in the above referenced matter. Please accept this letter in lieu of a more formal motion seeking leave to file a reply brief exceeding page limitations allowed per Your Honor's Individual Practices.

We have just reviewed the just-filed opposition papers. Defendants have raised many fact issues in the Declaration of Dr. Jay Varma, at least some of which intend to contest or clarify. Further, there are numerous legal points addressed by defendants as well. Given the complexities involved and the necessity to address such matters in a manner befitting the seriousness of the subject matter, we respectfully request leave to file a reply brief that is fifteen (15) pages in length. We have so moved immediately in light of the time constraints, and our desire not to impose this request on the Court at the last moment, so that we may be guided accordingly.

We thank Your Honor for consideration of the above.

Respectfully yours,

WEINER LAW GROUP LLP

By: Ronald A. Berutti
Ronald A. Berutti
A Member of the Firm

RAB:

cc: Kerri A. Devine, Esq. – New York City Law Department (via ECF)
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